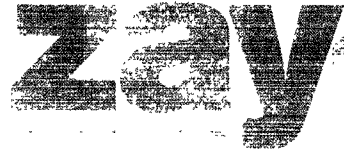


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360 Hamilton Avenue, 7th Floor
White Plains, New York 10601
jill.sandford@zayo.com
(914) 421-7585

Via: Overnight Mail

February 20, 2013

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

**Re: *Annual Customer Proprietary Network Information Compliance
Certification; EB Docket No. 06-36***

Dear Ms. Dortch,

Please find enclosed an original and a copy of the Annual Proprietary Network Information ("CPNI") Compliance Certification for the following Companies:

American Fiber Systems, Inc.	#821650
Zayo Group LLC	#828965
360networks (USA), Inc.	#821352
Arialink Telecom LLC	#825146
Abovenet Communications, Inc.	#820598
US Carrier Telecom LLC	#821994
First Telecom Services LLC	#827681
Allegheny Communications Connect, Inc.	#824656

Please have the copy date stamped and return in the self addressed stamped envelope provided.

Sincerely,


Jill Sandford
Associate General Counsel

No. of Copies rec'd 0
List ABCDE

Enclosure
SASE

Annual Customer Proprietary Network Information Certification
Pursuant to 47 C.F.R. § 64.2009(e)
EB Docket No. 06-36

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Annual 64.2009(e) CPNI Certification for 2012.

Date filed: February 13, 2013

Names of Companies covered by this certification:

Form 499 Filer ID:

American Fiber Systems, Inc.	#821650
Zayo Group LLC	#828965
360networks (USA), Inc.	#821352
Arialink Telecom LLC	#825146
Abovenet Communications, Inc.	#820598
US Carrier Telecom LLC	#821994
First Telecom Services LLC	#827681
Allegheny Communications Connect, Inc.	#824656

Name of signatory: Scott Beer

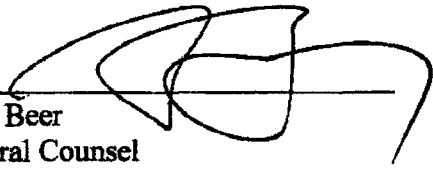
Title of signatory: General Counsel

I, Scott Beer, certify that I am an officer of the Companies named above, and acting as an agent of the companies, that I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the Companies' procedures ensure the company is in compliance with the requirements set forth in sections 64.2001 *et seq.* of the Commission's rules.

The Companies have not taken any actions (instituted proceedings or filed petitions at either state commissions, courts, or at the FCC) against data brokers in the past year. The Companies have no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (*e.g.*, through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps the company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the FCC's modified CPNI rules.

The Companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Scott Beer
General Counsel

Date: 2-14-2013

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**Customer Proprietary Network Information Certification
Attachment A**

The Companies have established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules, as modified by the Commission in 2007.

The Companies provide private telecommunications services over dedicated lines to large enterprise customers pursuant to ICB contracts. The Companies' customer contracts uniformly contain confidentiality agreements that address customers' private information. It is the Companies' policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

Safeguarding against pretexting

- The Companies' take reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Companies' are committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

Training and discipline

- The Companies have an express disciplinary process in place for violation of the Companies' CPNI practices and procedures. The Companies' employees are required to review and abide by Companies' Code of Conduct, which prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

The Companies' use of CPNI

- The Companies use CPNI for the following purposes:
 - (1) To initiate, render, maintain, repair, bill and collect for services
 - (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - (3) For network maintenance; and
 - (4) As required by law.
- The Companies do not use CPNI for any marketing purposes. Specifically, the Companies do not use CPNI to market services to its existing customers. Nor do the Companies share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.
- The Companies' policy is not to share, sell, lease or otherwise provide CPNI to third parties. The Companies will disclose CPNI to a third party only when required by a lawfully issued

government subpoena or pursuant to an appropriate non-disclosure agreement for corporate or financial transactions.

Additional safeguards

- The Companies do not use CPNI for marketing purposes and therefore do not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- The Companies have established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- The Companies designate one or more officers, as an agent or agents of the Companies, to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- The Companies do not disclose CPNI over the phone and do not allow for online access to CPNI.
- In the event of a breach of CPNI, the Companies will comply with all applicable breach notification laws.

DOCKET NO. 06-34

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o This document is confidential (NOT FOR PUBLIC INSPECTION)
- o An oversize page or document (such as a map) which was too large to be scanned into the ECFS system.
- o Microfilm, microform, certain photographs or videotape.
- o Other materials which, for one reason or another, could not be scanned into the ECFS system.

The actual document, page(s) or materials may be reviewed (EXCLUDING CONFIDENTIAL DOCUMENTS) by contacting an Information Technician at the FCC Reference Information Centers) at 445 12th Street, SW, Washington, DC, Room CY-A257. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician

11 Photos